

November 16, 2021

**VIA ECF**

Honorable Carol B. Amon  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Schonberg et al. v. Strulovich et al.* - Case No. 17-cv-2161

Dear Judge Amon:

The Plaintiffs represented by Bronstein, Gewirtz & Grossman LLC (“BGG Firm”)<sup>1</sup> and Defendants represented by Herrick, Feinstein, LLP (“Strulovich Defendants”) jointly write to update the Court on the status of their efforts to negotiate an agreement that would govern a global arbitration.

As indicated in our letter dated September 17, 2021, the parties have finalized the terms of the arbitration agreement and the arbitration panel has confirmed its approval. The parties are in the process of scheduling dates for the hearing with the arbitration panel. The vast majority of signatures to the arbitration agreement have been obtained. Once the arbitration agreement is deemed “effective,” stipulations will be filed staying the claims against the Strulovich Defendants.

Accordingly, we request that the Court adjourn the upcoming status conference from November 23, 2021 to February 3, 2022 with the parties to update the Court by letter by January 27, 2022: (1) on the status of their efforts to finalize the arbitration agreement; (2) whether the Strulovich Defendants still seek leave to file a motion to stay the instant action; and (3) whether the Plaintiffs still seek leave to renew their motion to amend the complaint.

Respectfully submitted,

/s/ Yitzchak E. Soloveichik      /s/ Scott C. Ross

Yitzchak E. Soloveichik	Scott C. Ross
<i>Counsel for Plaintiffs</i>	<i>Counsel for</i>
	<i>Strulovich Defendants</i>

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<sup>1</sup> The BGG Firm represents all of the plaintiffs in this action except five: Shimon Asulin, Clara Grossman, Irving Grossman, David Schonfeld, and Pnina Schonfeld.